

3719 '99 MAY 19 P2:27

Food and Drug Administration: May 14, 1999

I do not want to "Eliminate" Labeling of  
Irradiated Foods!! I do not want it used. Period!

\* My daughter has allergies.....!!

I am an environmentalist - ex-former

Aren't "pesticides" enough without adding something  
else!! Enough concern with that!!

Changing the name! Still the same thing! Does not  
seem honest!

Sure you will hear all the other reasons!

God gave us good food. Man seems to only  
want to "spoil" it!

Sincerely  
Harriet Oeder

98N-1038

C2295



## FDA WANTS TO ELIMINATE LABELING OF IRRADIATED FOODS

The U.S. Food and Drug Administration has begun soliciting public comment about whether they should remove all current labeling requirements for irradiated food.

Currently, the FDA requires that retail packages or displays of irradiated food include both the logo for irradiation (radura symbol) and a statement like "treated by irradiation," and that such notices be prominently displayed. The FDA is asking whether current irradiation labeling requirements be revised and less conspicuously displayed, or consider such alternative terms as "cold pasteurization" and "electronic pasteurization," instead of irradiation; and whether such labeling requirements should expire at a specified date in the future.

### TAKE ACTION!

**DEADLINE:** Written comments must be submitted by May 18, 1999.

**ADDRESSES:** Submit written comments and supporting material to the Docket number: #98N-1038, Dockets Management Branch (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852. Email at: [FDADockets@oc.fda.gov](mailto:FDADockets@oc.fda.gov). If emailing comments put the Docket number in the subject line.

### FACTS ABOUT IRRADIATION

In the food irradiation process, food is exposed to gamma radiation (ionizing radiation) where the food is passed through a chamber containing radioactive cobalt-60 (or cesium 137), electron beams or X-rays that bombard the food and kill bacteria, insects and mold.

Irradiation also destroys vitamins. Even at low doses, some irradiated foods lose 20% of vitamins such as C, E, K, and B complex. Because irradiation breaks down cell walls, irradiated foods which are stored for long periods may lose 70-80% of their vitamin content.

And it is unclear what effect eating irradiated food will have on humans. Studies on animals fed irradiated foods have shown increased tumors, reproductive failures and kidney damage. Chromosomal abnormalities occurred in children from India who were fed irradiated wheat.

Despite irradiation's hazards and drawbacks, it is being aggressively pushed by an embattled meat industry looking for cover in the wake of numerous recent food-borne illness outbreaks, particularly E coli and listeria. At the same time, the industry has vigorously opposed efforts to clean up filthy slaughter houses, slow down meat production processing lines, stop the feeding of antibiotics and rendered animal protein to livestock, and increase the number of federal meat inspectors - all more productive measures to reduce food borne-illnesses.

### CONSUMER RIGHT TO KNOW

Without labeling of irradiated food there will be no way for consumers to know that food has been irradiated.

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## DEMAND LABELING AND TESTING OF GENETICALLY ENGINEERED FOOD

In May 1998, the Organic Consumers Association's legal team, the Center for Food Safety, filed a lawsuit against the Food and Drug Administration. The lawsuit currently in U.S. District Court for D.C. Docket No. 98-CV-1300, is challenging the FDA's current policy on genetically engineered foods, specifically its failure to require labeling or any safety testing. In addition, the lawsuit alleges that the FDA has ignored significant health and environmental risks associated with genetically engineered foods.

### UNLABELED GENETICALLY ENGINEERED FOODS ARE ON THE MARKET

Currently, 36 different genetically engineered whole foods are being sold without labeling or safety testing. These include potatoes, tomatoes, soy, corn, squash and many other fruits and vegetables to which a variety of new genes from different species have been added. These genetically engineered whole foods are also used as ingredients in processed foods, and are present in a number of mass consumed food products from major soy based baby formulas to some of the most popular corn chip brands. Because of FDA's failure to require labeling, millions of American infants, children and adults are consuming genetically engineered products each day without their knowledge.

### HEALTH CONCERNS

The most pressing health concern involves the impact of inserting novel genes into fruits, vegetables and other food products. Each gene insertion creates the possibility that a nontoxic element in the food could become toxic and endanger human health. Food allergies are another major health concern. Those with food allergies will have no way of knowing what foods to avoid. The basis for concern is a recent study reported in the New England Journal of Medicine, which tested the effects of including a gene from a Brazil Nut in a soybean. The study found that people who were allergic to Brazil Nuts were also allergic to the genetically engineered soybean. Health professionals are also concerned that the mass consumption of genetically engineered foods could make treating infections more difficult because some genetically modified foods contain antibiotic resistant genes.

### RELIGIOUS CONCERNS

Millions of Americans feel obligated to avoid genetically engineered foods based on their ethical and religious principles. Many Jews and Muslims need to avoid foods with substances from specific animals, while devout vegetarians want to avoid substances from any animal. Additionally, a considerable portion of the population is religiously motivated to avoid genetically engineered foods because they view it as counter to the biological integrity of creation. By refusing to label genetically engineered foods, the FDA is infringing on the free exercise of religion as guaranteed by the Constitution and the Religious Freedom Restoration Act (RFRA).

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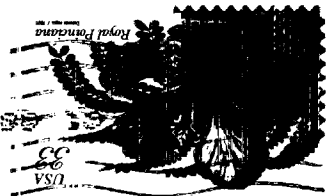
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